

EXHIBIT A

1 GUIDO SAVERI (Bar No. 22349)
 guido@saveri.com
 2 R. ALEXANDER SAVERI (Bar No. 173102)
 rick@saveri.com
 3 CADIO ZIRPOLI (Bar No. 179108)
 cadio@saveri.com
 4 SAVERI & SAVERI, INC.
 111 Pine Street, Suite 1700
 5 San Francisco, California 94111
 Telephone: (415) 217-6810
 6 Facsimile: (415) 217-6913

7 *Interim Lead Counsel for the*
 8 *Direct Purchaser Plaintiffs Class*

MARIO N. ALIOTO (Bar No. 56433)
 malioto@tatp.com
 9 LAUREN C. RUSSELL (Bar No. 241151)
 lauren russell@tatp.com
 10 TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP
 11 2280 Union Street
 San Francisco, California 94123
 12 Telephone: (415) 563-7200
 Facsimile: (415) 346-0679

13 *Interim Lead Counsel for the*
 14 *Indirect Purchaser Plaintiffs Class*

15 James L. McGinnis (Bar No. 95788)
 jmcginnis@sheppardmullin.com
 16 SHEPPARD MULLIN RICHTER & HAMPTON LLP
 Four Embarcadero Center, 17th Floor
 17 San Francisco, California 94111
 Telephone: (415) 434-9100
 18 Facsimile: (415) 434-3947

19 *Defense Liaison Counsel*

20
 21 **UNITED STATES DISTRICT COURT**

22 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

23 IN RE: CATHODE RAY TUBE (CRT)
 24 ANTITRUST LITIGATION

MASTER FILE NO.. 07-cv-5944 SC

MDL NO. 1917

25 **STIPULATION AND [PROPOSED]**
 26 **ORDER**
 27
 28

1 It is hereby stipulated by and between the Direct Purchaser Plaintiffs ("DPPs") and the
2 Indirect Purchaser Plaintiffs ("IPPs") and the undersigned defendants ("Defendants") in this action
3 as follows:

4 1. That all documents produced in the *In Re: TFT-LCD (Flat Panel) Antitrust -*
5 *Litigation, Case No. M07-1827 SI ("In Re: TFT-LCD")* by entities, including their affiliates except
6 for Toshiba Mobile Display Co., Ltd., that produced documents in *In Re: TFT-LCD* and are
7 defendants in this action, can be reviewed by Plaintiffs' counsel in this action for the limited
8 purpose of identifying documents for potential production in this action pursuant to the procedures
9 described in Paragraphs 2 and 3 below. Such review will be subject to the protective order in *In*
10 *Re: TFT-LCD* (Docket No. 241) as well as the protective order herein (Docket No. 306).

11 2. On or before September 1, 2011, Plaintiffs shall provide to all defendants a list of
12 the foregoing documents from *In Re: TFT-LCD* that they seek to use in this action. The defendant
13 that produced, or whose affiliate produced, a document in *In Re: TFT-LCD* so identified
14 ("Producing Party") shall have 45 days to state objections to adding any such document to the
15 CRT discovery record. Any document as to which no objections have been made shall be deemed
16 produced herein. The parties shall meet and confer to resolve any objections made and, if
17 necessary, discuss a process for seeking a ruling from the Special Master and the Court.

18 3. After this initial list is provided, Plaintiffs may supplement the list as necessary
19 with additional documents covered by Paragraph 1 above to the extent that Plaintiffs were in good
20 faith unable to finish their review of documents for inclusion in the list contemplated by Paragraph
21 2 above. Plaintiffs shall provide notice to all defendants of any additions to the list of documents
22 from the *TFT-LCD* action that they seek to use in this action, absent a showing of good cause, no
23 later than seven calendar days before intended use in any deposition, submission or other
24 proceeding, and no later than 30 days prior to the discovery cut off. Absent a showing of good
25 cause, Plaintiffs may identify no more than ten additional documents in advance of each
26 deposition. The Producing Party shall promptly state objections to adding any document
27 identified by Plaintiffs to the CRT discovery record, if any, and the parties shall use the
28 procedures agreed upon for resolution of disputes as stated in Paragraph 2 above. Any such

1 resolution will be done on an expedited basis so as not to disrupt the taking of a noticed
2 deposition, or the continuance of any pre-trial dates.

3 4. All objections by Defendants with respect to relevancy and admissibility are
4 preserved as to any document from *In Re: TFT-LCD* that may be produced pursuant to the
5 foregoing procedures.

6 5. Absent Court order, this stipulation shall not apply to LG Display Co., Ltd. and LG
7 Display America, Inc. (collectively "LG Display"). Nothing in this stipulation shall preclude
8 Plaintiffs from seeking in this litigation the production of documents produced by LG Display in
9 *In Re: TFT-LCD*.

10 DATED: June 17, 2011

SAVERI & SAVERI, INC.
GUIDO SAVERI
R. ALEXANDER SAVERI
CADIO ZIRPOLI

11 By: /s/ Guido Saveri

GUIDO SAVERI

12 *Interim Lead Counsel for the*
13 *Direct Purchaser Plaintiffs Class*

14 DATED: June 17, 2011

TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP
MARIO N. ALIOTO

15 By: /s/ Mario N. Alioto

MARIO N. ALIOTO

16 *Interim Lead Counsel for the*
17 *Indirect Purchaser Plaintiffs Class*

18 DATED: June 17, 2011

MORGAN, LEWIS & BOCKIUS LLP
DIANE L. WEBB

19 By: /s/ Scott A. Stempel

SCOTT A. STEMPEL

20 *Counsel for Defendants Hitachi, Ltd, Hitachi Asia,*
21 *Ltd., Hitachi America, Ltd., Hitachi Electronic Devices*
22 *(USA), Inc., and Hitachi Displays, Ltd.*

1 DATED: June 17, 2011

ARNOLD & PORTER LLP
ERIC SHAPLANDBy: /s/ Eric ShaplandERIC SHAPLAND
Counsel for Defendants LG Electronics, Inc., LG
Electronics USA, Inc. and LG Electronics Taiwan
Taipei Co., Ltd.

6 DATED: June 17, 2011

DEWEY & LEBOEUF LLP
JEFFREY L. KESSLERBy: /s/ Jeffrey L. KesslerJEFFREY L. KESSLER
Counsel for Defendants Panasonic Corporation of
North America, MT Picture Display Co., Ltd. and
Panasonic Corporation (f/k/a/ Matsushita Electric
Industrial Co.)

12 DATED: June 17, 2011

BAKER BOTTS L.L.P.
JOSEPH OSTOYICHBy: /s/ Joseph OstoyichJOSEPH OSTOYICH
Counsel for Defendants Koninklijke Philips Electronics
N.V., Philips Electronics North America Corporation,
Philips Electronica Industries (Taiwan), Ltd., and
Philips da Amazonia Industria Electronica Ltda.

19 DATED: June 17, 2011

SHEPPARD MULLIN RICHTER & HAMPTON
LLP
JAMES L. MCGINNISBy: /s/ James L. McGinnisJAMES L. MCGINNIS
Defense Liason Counsel and Counsel for Defendants
Samsung SDI America, Inc., Samsung SDI Co., Ltd.,
Samsung SDI (Malaysia) Sdn. Bhd., Samsung SDI
Mexico S.A. de C.V., Samsung SDI Brasil Ltda.,
Shenzhen Samsung SDI Co. Ltd., and Tianjin Samsung
SDI Co., Ltd.PEARSON, SIMON, WARSHAW & PENNY, LLP
15186 VENTURA BOULEVARD, SUITE 400
SHERMAN OAKS, CALIFORNIA 91403

PEARSON, SIMON, WARSHAW & PENNY, LLP
16165 VENTURA BOULEVARD, SUITE 400
SHERMAN OAKS, CALIFORNIA 91403

1 DATED: June 17, 2011

O'MELVENY & MYERS, LLP
IAN SIMMONS

2

3

By: /s/ Ian Simmons

4

IAN SIMMONS

5

*Counsel for Defendants Samsung Electronics Co., Ltd.
and Samsung Electronics America, Inc.*

6

7 DATED: June 17, 2011

BAKER & MCKENZIE LLP
PATRICK J. AHERN

8

9

By: /s/ Patrick J. Ahern

10

PATRICK J. AHERN

11

*Counsel for Defendant Tatung Company of America,
Inc.*

12

13 DATED: June 17, 2011

WHITE & CASE LLP
LUCIUS B. LAU

14

15

By: /s/ Lucius B. Lau

16

LUCIUS B. LAU

17

*Counsel for Defendants Toshiba Corporation, Toshiba
America, Inc., Toshiba America Information Systems,
Inc., Toshiba America Consumer Products, L.L.C., and
Toshiba America Electronic Components, Inc.*

18

19 DATED: June 17, 2011

FRESHFIELDS BRUCKHAUS DERINGER US
LLP
TERRY CALVANI

20

21

By: /s/ Terry Calvani

22

TERRY CALVANI

23

*Counsel for Defendant Beijing Matsushita Color CRT
Company, Ltd.*

24

25

26

27

28

1 **ATTESTATION PURSUANT TO GENERAL ORDER 45**

2 I, Lauren C. Russell, attest that concurrence in the filing of this document has been
 3 obtained from all signatories. I declare under penalty of perjury under the laws of the United
 4 States of America that the foregoing is true and correct. Executed this 17th day of June 2011, at
 5 San Francisco, California.

6
 7
 8 /s/ Lauren C. Russell
 9

10
 11
 12 **IT IS SO RECOMMENDED.**

13 DATED: June 20, 2011
 14

15
 16 Charles A. Legge
 17 Hon. Charles A Legge
 Special Master

18 **IT IS SO ORDERED UPON THE RECOMMENDATION OF THE SPECIAL MASTER.**

19 DATED: June 29, 2011
 20

